

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

JOHN JENKINS,

Plaintiff,

vs.

STEVEN BRADY and T&C
TRANSPORTATION, LLC,

Defendants.

C.A. No.: 2:24-cv-07183-BHH

**MOTION TO AMEND SCHEDULING
ORDER**

Defendants Steven Brady and T&C Transportation LLC, by and through their undersigned attorneys, and with the consent of the Plaintiff, hereby move for the entry of a Third Amended Scheduling Order extending Defendant's Expert Disclosure deadline by one month. A copy of Defendants' proposed order is attached hereto as Exhibit A. In support of this motion, Defendants would show:

1. The current scheduling order for this case requires Defendants to name experts by August 29, 2025, and for discovery to be completed by October 31, 2025. *See* ECF No. 13. The Parties are engaged in ongoing discovery, but recent delays have impeded Defendants' efforts to develop their case and Defendants do not anticipate being able to meet these deadlines. Defendants would show that good cause exists for seeking an extension and that the proposed extension of only one month is reasonable and not for the purposes of delay.
2. The basis for this Request is that Plaintiff's testimony is necessary for Defendants' experts to finalize their opinions but Plaintiff did not appear for his deposition on Thursday, August 21. Defendants are informed and believe that the reason for Plaintiff's nonappearance was

innocuous as Defendants understand a major traffic incident on Interstate 26 prevented the flow of traffic into Charleston and Plaintiff was unable to drive to Defense Counsel's Office. Nonetheless, Defendants have been deprived of their opportunity to depose the Plaintiff and obtain the necessary testimony.

3. This case involved a motor vehicle accident in which the only known fact witnesses are the drivers themselves. Therefore, the Plaintiff's testimony is crucial for Defendants' experts to review in formulating their opinions.
4. Counsel are working to reschedule the deposition and anticipate it being completed in September. Therefore, the Defendants request a one-month extension of the deadline making expert disclosures due on or before Friday, October 3, 2025.
5. The Undersigned has communicated with Plaintiff's Counsel regarding this extension and the Plaintiff consents to the same.
6. Defendants believe that the requested extension of one month is reasonable and provides a satisfactory amount of time to obtain the necessary deposition testimony.

Dated this 28th of August, 2025

WALL TEMPLETON & HALDRUP, P.A.

s/ Ford H. Thrift

Ford H. Thrift (Fed ID # 12881)

Ford.Thrift@WallTempleton.com

145 King Street, Suite 300

Post Office Box 1200

Charleston, South Carolina 29402

(843) 329-9500

Attorney for the Defendants

MORGAN & MORGAN, P.A.

s/Cooper Klaasmeyer (w/ permission)

James G. Biggart, II

Cooper Klaasmeyer

Morgan & Morgan, P.A.

4401 Belle Oaks Drive, Ste. 300

N. Charleston, South Carolina 29405

Cooper.klaasmeyer@forthepeople.com

biggartlitigation@forthepeople.com

Attorneys for the Plaintiff